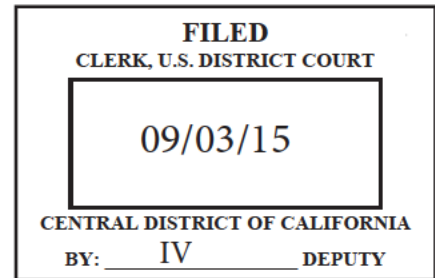


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JS-6

10 UNITED STATES DISTRICT COURT  
11 FOR THE CENTRAL DISTRICT OF CALIFORNIA  
12 WESTERN DIVISION

13 UNITED STATES OF AMERICA,  
14 Plaintiff,  
15 v.  
16 ALBERT MORA,  
17 Defendant.

No. CV 15-06644 SVW (Ex)

FINAL JUDGMENT OF PERMANENT  
INJUNCTION AGAINST ALBERT  
MORA

18 Pursuant to the "STIPULATION FOR ENTRY OF FINAL JUDGMENT OF  
19 INJUNCTION AGAINST ALBERT MORA" filed concurrently herewith:

20 **IT IS HEREBY ORDERED, ADJUDGED, AND DECREED:**

21 1. The court has jurisdiction over ALERBT MORA (hereinafter "defendant") and  
22 over the subject matter of the proposed action pursuant to 28 U.S.C. §§ 1340 and 1345.

23 2. Defendant does not admit to any of the other allegations of the complaint, but  
24 has voluntarily consented to the entry of a "FINAL JUDGMENT OF INJUNCTION"  
25 against him and agrees to be bound by its terms.

26 3. Pursuant to 26 U.S.C. §§ 7402 and 7407, defendant, individually, or acting  
27 through or by any other name or entity, representatives, agents, employees, attorneys,  
28

1 and anyone in active participation with him, is enjoined from directly or indirectly,

- 2 a. Engaging in activity subject to penalty under 26 U.S.C. §§ 6700, 6701,  
3 6694 and 6695, i.e., aiding, assisting in, procuring, or advising with  
4 respect to the preparation of any portion of a return, affidavit, claim, or  
5 other document, when defendant knows or has reason to know that  
6 portions will be used in connection with a material matter arising under  
7 the federal tax law, and defendant knows that the relevant portion will  
8 result in the material understatement of the liability for the tax of another  
9 person (with the exception of himself and his legal spouse);  
10 b. Aiding or assisting in the preparation of federal income tax returns,  
11 amended returns, or any other related documents and forms that  
12 defendant knows will result in the understatement of any tax liability or  
13 the overstatement of federal tax returns (with the exception of himself  
14 and his legal spouse);  
15 c. Engaging in activity subject to penalty under 26 U.S.C. § 6695; and  
16 d. Engaging in other conduct that substantially interferes with the proper  
17 administration and enforcement of the internal revenue laws.

18 4. Defendant must notify, in writing, all persons whose tax returns he has prepared  
19 from January 1, 2010 to the date of the Court's order, of the findings and relief by the  
20 Court, including in such notice to each person a copy of the Complaint and of the  
21 Court's Final Judgment of Injunction; and that defendant provide plaintiff's attorneys  
22 with a list of the names, Social Security numbers, addresses, email addresses, and  
23 telephone numbers of all persons so notified within thirty (30) days of the date the Order  
24 is entered.

25 5. The United States may conduct limited post-judgment discovery to ensure  
26 defendant's compliance with the terms of this injunction.

27 6. This Court will retain jurisdiction over this matter and defendant for the purpose  
28 of enforcing this injunction.



1        7. This "FINAL JUDGMENT OF INJUNCTION" is the final judgment in this  
2 matter. Defendant herein waives any and all right to appeal from the "FINAL  
3 JUDGMENT OF INJUNCTION."

4        8. Defendant consents to the entry of the "FINAL JUDGMENT  
5 OF INJUNCTION" without any further notice, and agrees to be bound by its terms.

6        9. Defendant agrees that if he violates the "FINAL JUDGMENT OF  
7 INJUNCTION," he may be subject to civil and criminal sanctions for contempt of court,  
8 including imprisonment.

9        **IT IS SO ORDERED.**

10       DATED: September 3, 2015

  
\_\_\_\_\_  
UNITED STATES DISTRICT JUDGE

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13       Respectfully submitted,

14       EILEEN M. DECKER  
15       United States Attorney  
16       SANDRA R. BROWN  
17       Assistant United States Attorney  
18       Chief, Tax Division

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